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9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11 SAN FRANCISCO DIVISION

12 RICHARD KADREY, *et al.*,
13 Individual and Representative Plaintiffs,
14 v.
15 META PLATFORMS, INC., a Delaware
16 corporation;
17 Defendant.

Case No. 3:23-cv-03417-VC-TSH

**DECLARATION OF KYANNA SABANOGLU IN
SUPPORT OF DEFENDANT'S
ADMINISTRATIVE MOTION TO FILE UNDER
SEAL OPPOSITION TO MOTION FOR LEAVE
TO FILE THIRD AMENDED CONSOLIDATED
COMPLAINT AND SUPPORTING EVIDENCE**

I, Kyanna Sabanoglu, hereby declare:

1. I am Associate General Counsel, IP Litigation for Defendant, Meta Platforms, Inc. (“Meta”). I have personal knowledge of the facts set forth in this declaration and, if called to testify as a witness, could and would testify competently thereto.

2. I make this declaration in support of Defendant’s Administrative Motion to File Under Seal Opposition to Motion for Leave to File Third Amended Consolidated Complaint and Supporting Evidence (“Motion”). The Motion seeks to have the following documents entirely or partially sealed:

Document	Sealing Request
Meta’s Opposition to Motion for Leave to File Third Amended Consolidated Complaint (“Opposition”)	<ul style="list-style-type: none"> Redacted portions
Declaration of Kathleen Hartnett In Support of Opposition (“Hartnett Declaration”)	<ul style="list-style-type: none"> Redacted Portions
Exhibit A to Hartnett Declaration	<ul style="list-style-type: none"> Entire document
Exhibit B To Hartnett Declaration	<ul style="list-style-type: none"> Entire document
Exhibit C to Hartnett Declaration	<ul style="list-style-type: none"> Entire document
Exhibit D to Hartnett Declaration	<ul style="list-style-type: none"> Entire document
Exhibit E to Hartnett Declaration	<ul style="list-style-type: none"> Entire document
Exhibit F to Hartnett Declaration	<ul style="list-style-type: none"> Entire document
Exhibit G to Hartnett Declaration	<ul style="list-style-type: none"> Entire document
Exhibit H to Hartnett Declaration	<ul style="list-style-type: none"> Entire document

3. Exhibit A and B to the Hartnett Declaration, which are different versions of the same document, is a highly sensitive internal document with detailed technical discussion concerning one of the datasets used to train Meta’s generative AI models, including discussion of its implementation and use in developing those models. The document was designated “Highly Confidential – Attorneys Eyes Only” under the Stipulated Protective Order. Public disclosure of

1 the information in this document exposes Meta to the risk of competitive harm.

2 4. Exhibit C to the Hartnett Declaration is an excerpt of the transcript of the deposition
3 of Meta employee Todor Mihaylov, which has been designated “Highly Confidential – Attorneys’
4 Eyes Only” under the Stipulated Protective Order. The excerpt includes discussion of the document
5 that comprises Exhibits A and B to the Hartnett Declaration, discussed above. Public disclosure of
6 the information in this excerpt exposes Meta to the risk of competitive harm.

7 5. Exhibit D to the Hartnett Declaration is an excerpt of transcript of the deposition of
8 Meta employee Melanie Kambadur which has been designated “Highly Confidential – Attorneys’
9 Eyes Only” under the Stipulated Protective Order. The excerpt includes discussion of confidential
10 information concerning the data used to train its Llama models as well as Meta’s highly sensitive
11 internal processes for training those models. Public disclosure of the information in this excerpt
12 exposes Meta to the risk of competitive harm.

13 6. Exhibit E to the Hartnett Declaration is an excerpt of the transcript of the deposition
14 of Meta employee Ahmad Al-Dahle, which has been designated “Highly Confidential – Attorneys’
15 Eyes Only” under the Stipulated Protective Order. The excerpt includes discussion of Meta’s
16 highly sensitive business processes and procedures for training and developing Meta’s generative
17 AI models. The discussion also refers to and involves a document produced by Meta that was
18 designated “Highly Confidential – Attorneys’ Eyes Only.” Public disclosure of the information in
19 this excerpt exposes Meta to the risk of competitive harm.

20 7. Exhibit F to the Hartnett Declaration is a highly confidential internal document with
21 analysis of datasets used to train Meta’s generative AI models. The document and the comments
22 contained therein reflect Meta’s internal decision-making as to development of its AI models and
23 include technical details regarding Meta’s processes in developing those models. This document
24 was designated “Highly Confidential – Attorneys’ Eyes Only” under the Stipulated Protective
25 Order. Public disclosure of the information in this document exposes Meta to the risk of
26 competitive harm.

27 8. Exhibits G and H to the Hartnett Declaration are highly confidential internal
28 documents describing Meta’s internal processing of data for training its generative AI models. The

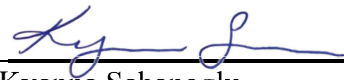
1 documents include highly sensitive technical details regarding its data processing methods and were
2 designated “Highly Confidential – Attorneys’ Eyes Only” under the Stipulated Protective Order.
3 Public disclosure of the information in these documents exposes Meta to the risk of competitive
4 harm.

5 9. The redacted portions of Meta’s Opposition and the Hartnett Declaration reflect,
6 refer to, and discuss the information contained in the highly confidential documents above as well
7 as documents attached to the Declaration of Joshua M. Stein, which Meta has also sought to seal
8 (Dkts. 301-2–10). To the extent portions of the materials Meta seeks to seal include non-
9 confidential background information, sealing of such information within the context of Meta’s
10 Opposition is necessary to maintain the confidentiality of Meta’s protected information, as the
11 discussion necessarily implies conduct by Meta which is highly sensitive, non-public, and which
12 Meta has taken steps to keep confidential. As such, public disclosure of the information in those
13 redacted portions exposes Meta to the risk of competitive harm.

14 10. Public disclosure of the information contained in the above-referenced materials
15 exposes Meta to the risk of competitive harm by revealing Meta’s non-public business strategies,
16 trade secret information, technical data pertaining to the development of its generative AI offerings.
17 For this reason, Meta takes steps to carefully protect the confidentiality of this sort of information

18 I declare under penalty of perjury under the laws of the United States of America that the
19 foregoing is true and correct

20 Executed in New York, New York on this 11th day of December, 2024.

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22 
23 Kyanna Sabanoglu

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